

MEMO ENDORSED

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Via Fax

The Honorable Frank B. Maas
 United States District Court
 Southern District of New York
 United States Courthouse
 500 Pearl Street, Room 740
 New York, New York 10007

In a case of this complexity, it will not be possible to please all of the people (or the Court for that matter) all of the time. While the majority view will not always carry the day, as to this issue it does. The deadline to complete the rolling production therefore

Re: In re Terrorist Attacks of September 11, 2001, MDL No. 1570

Your Honor:

is ended to 8/29/11. *Belfair, USMT,*
4/24/11,

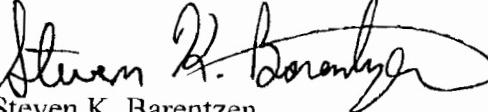
I write in response to today's letter to the Court from Sean Carter and Alan Kabat which states that "the Defendants who are currently subject to discovery . . . request that the deadline for completing their 'rolling' production of documents be extended from April 29, 2011 to August 29, 2011."

This statement is incorrect as to our client Dr. Jamal Barzinji, a defendant in this case currently subject to discovery who strongly opposes the requested extension.

From our perspective, there has been a lack of urgency in conducting discovery on both sides. While some of the parties in this case may see some strategic benefit to extending this case out as long as possible, Dr. Barzinji believes that given the horrendous and prejudicial allegations leveled against him, discovery should proceed swiftly and promptly so that Dr. Barzinji can move in timely manner to have the claims against him dismissed on summary judgment. Extensions of the discovery deadlines, like the one sought by Plaintiffs and Defendants, will greatly prejudice an innocent party such as Dr. Barzinji.

While, as practical matter, a brief extension of the looming document production deadline is necessary, the extension should be both short in duration, at the most two months, and final. Justice delayed is justice denied.

Respectfully submitted,


Steven K. Barentzen

cc: All Counsel of Record (by e-mail)